

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application for Rehearing of Resolution
ESRB-8.

A.18-08-007

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
RESPONSE TO REQUEST OF REHEARING OF
RESOLUTION ESRB-8**

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Dated: August 27, 2018

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Pursuant to California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Rule 16.1(d), Pacific Gas and Electric Company (“PG&E”) respectfully submits this response to the *Application of Zuma Beach FM Broadcasters for Rehearing of Resolution ESRB-8* (“Rehearing Application”), filed by Zuma Beach FM Broadcasters (“Zuma”) on August 10, 2018.

Resolution ESRB-8 (“Resolution”) addresses the proactive de-energization of electric facilities to protect public safety, and includes requirements for notification, mitigation, and reporting of de-energization events. The Resolution extends requirements that already existed for San Diego Gas & Electric Company (“SDG&E”) to PG&E and Southern California Edison Company (“SCE”), with the intent to protect the public and to prevent wildfires.¹ The Resolution “provides guidelines that [the utilities] must follow and strengthens public safety requirements when [a utility] decides to de-energize its facilities during dangerous conditions.”² As the Commission succinctly determined, the de-energization rules and requirements addressed in the Resolution can “save lives, protect property, and prevent fires.”³

¹ Resolution at p. 1.

² *Id.*

³ *Id.*, Finding #6.

As a preliminary matter, Zuma’s requested relief is unclear. Initially, in its Request for Relief, Zuma asks that the Commission “revisit” the Resolution and suggests that the Commission initiate a formal rulemaking.⁴ At another point, Zuma argues that the Commission should “reject” the Resolution and “reopen the issue in a manner [the Commission] chooses . . .”⁵ But Zuma also says that the Resolution “should be an interim policy until new rules can be instituted in this matter of vital public importance.”⁶

Regardless of the relief requested, Zuma’s Rehearing Application should be denied. The Commission provided adequate due process in reviewing and adopting the Resolution, contrary to Zuma’s claims. More importantly, it is critical that the Resolution remain effective. As the Commission is aware, there have already been substantial wildfires in California in 2018. Even Zuma acknowledges “[t]he urgency of the oncoming fall winds is duly noticed.”⁷ With fire season in full swing, it is essential that PG&E, SDG&E, and SCE have approved rules and requirements regarding de-energization. The Rehearing Application would cause ambiguity as to which rules and requirements, if any, are applicable; the current situation calls for clarity, not ambiguity. Should the Commission wish to revisit the rules and requirements in the Resolution

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⁴ Rehearing Application at p. 17.

⁵ *Id.*

⁶ *Id.*

⁷ *Id.* at p. 16.

at some point in the future, it is certainly able to do so. For now, however, it is important that the Resolution remain in effect. Thus, Zuma's Rehearing Application should be summarily denied.

Respectfully Submitted,

By: /s/ Alyssa T. Koo

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